

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

NIKI ROBINSON and PATRICK TOMLINSON,

Plaintiffs,

v.

Case No. 24-CV-00264

CITY OF MILWAUKEE, LYNDON EVANS,
CHRISTIAN GARRIDO, BRADLEY ORLANDO,
NICOLE PLEVAK, JOHN KOHLER,
JACOB WASECHEK, FIDAH MUSTAFA,
NATHANIEL PETERSEN, SEAN CARLETON,
and PAUL VENTO

Defendants.

**JOINT CIVIL L. R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION
TO EXTEND THE DEADLINES FOR FILING A RESPONSIVE PLEADING
AND EXECUTIVE SUMMARY**

NOW COME the Defendants, Lyndon Evans, and the City of Milwaukee, by and through counsel, Evan C. Goyke, City Attorney, Assistant City Attorney William Hotchkiss, and Assistant City Attorney Maria Mesoloras, and Plaintiffs, by and through counsel, James Odell of Strang Bradley, LLC, and respectfully submit their joint motion to extend the deadlines for filing a responsive pleading and executive summary in the above-captioned case.

On February 28, 2024, Plaintiffs filed their original Complaint in the above-captioned case. Pursuant to the Court's pre-trial procedures order, the parties are required to meet and confer concerning any proposed motions to dismiss and file a joint executive summary in compliance with the pre-trial procedures order before a motion to dismiss can be filed, no motion to dismiss can be filed until the Court sets a briefing schedule, and the deadline for filing the motion to dismiss is tolled until the Court issues its decision regarding the joint executive summary. [ECF 9]. The parties have been working diligently and collaboratively to discuss a

potential motion to dismiss and have already exchanged some preliminary discovery and conversations in an effort to focus the issue for the court.

On May 1, 2024, Plaintiffs amended their Complaint by adding/changing claims and adding defendants. [ECF 13]. As a result of new defendants being added to the suit, the responsive pleadings deadlines by Defendants City of Milwaukee and Sgt. Lyndon Evans will be far earlier than any responsive pleading deadlines concerning Defendants Christian Garrido, Bradley Orlando, Nicole Plevak, John Kohler, Jacob Wasechek, Fidah Mustafa, Nathaniel Petersen, Sean Carleton, and Paul Vento.

In the interests of judicial economy, and avoiding the confusion that comes with having different deadlines for different defendants, the parties respectfully request that the Court stay the responsive pleading and executive summary deadlines concerning Defendants City of Milwaukee, Sgt. Lyndon Evans, and all other named defendants until 21 days after all named parties have been served.

Dated and signed at Milwaukee, Wisconsin this 10th day of May, 2024.

STRANG BRADLEY, LLC.

s/James Odell

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